



July 1, 2004

Mr. Jim Christiansen
U.S. Environmental Protection Agency
999 18th Street, Suite 500
Denver, Colorado 80215

Subject: Investigation Strategy for the Proposed Demolition Derby Plot at the Former Stimson Lumber Site.

Dear Mr. Christiansen,

The purpose of this memorandum is to propose a modification to the sampling plan utilized for delineation and sampling of the proposed off-road bicycle track on the former Stimson Lumber Company property. As you will recall, CDM conducted soil sampling in May to characterize the area that the Lincoln County Port Authority had proposed for an off-road bicycle track. Since that time the Port Authority has informed EPA that a plot directly north of the area sampled, measuring approximately 360,000ft², is being proposed for a demo-derby track. CDM proposed the following modification to the sampling plan to characterize this new area for presence of LA asbestos in soils:

- Identify sampling locations using a 200-ft by 200-ft grid system.
- Within each 40,000 ft² grid, collect one 5-point composite surface sample (0 to 1 inch) and one 5-point composite subsurface sample (2 to 6 inch).
- From 5 randomly selected grids, collect one 5-point composite sample at depth (6 to 12 inches).
- This would result in a total of 24 samples being collected within the proposed demolition derby track area.

All samples need to be collected in accordance with the Final Sampling and Analysis Plan, Remedial Investigation, Contaminant Screening Study, Revision 1 (CDM, May 2003). In addition, since all previous soil samples collected in and around the proposed area are non-detect, it is recommended that this sampling effort be conducted in level D personal protective equipment (PPE).

If all soil sample results from this effort are non-detect for LA, construction of the track can proceed without further action. However, if any results are greater than non-detect, CDM suggests that work within that site be monitored using personal and perimeter air monitoring during construction activities. Personal air monitors should be worn for up to a week and be analyzed by TEM AHERA for LA. If during monitoring any LA is detected, work should be



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ceased and construction re-evaluated with EPA. Perimeter air monitors should be set up down wind for all work activity throughout construction. Once again, if any LA is detected, work should be ceased and construction re-evaluated with EPA.

Please feel free to contact me at 720-264-1116 with any questions you may have regarding this matter.

Sincerely,

An electronic signature block. It features a rectangular border containing the text 'E-Signed by Jeff G. Montera' and 'VERIFY authenticity with ApproveIt'. Below the text is a handwritten signature of Jeff G. Montera. A small icon of a document with a question mark is in the top right corner of the box.

Jeff Montera
Project Manager
CDM Federal Programs Corporation

cc: Tim Wall
Anni Autio
Scott Supernaugh
Tommy Cook
Paul Lammers